Plant Pathologists' Views on Regulation of Biocontrol Microbes

Considerations for Biocontrol of Plant Pathogens

- Disease triangle + biocontrol microbe
- Usually cannot cure plants after infected, so strategies are aimed at protecting from infection (limited in time and space)
- Invasive / exclusive ability
- Strategy often aimed at reducing disease incidence or severity below an economic threshold, rather than trying to kill the pathogen

Considerations for Biocontrol of Plant Pathogens (continued)

- Carrying capacity of ecosystem keeps us from being able to establish microbes long-term
- Species for the vast majority of microbes for control of plant diseases have never been reported as pathogenic on anything

Regulatory Agencies Are Doing a Good Job!

- Some concerns about the amount of time and money needed to register microbes, and sometimes the response time from Agencies
- APHIS proposal for classes A, B and C is good, since it recognizes that some classes of microbes warrant less scrutiny than others

Need a Mechanism to Lower Scrutiny on Microbes with a Safe History

- When EPA began regulating microbes, they decided not to regulate Rhizobium because of its well documented history of safety.
- We now have well documented history with some other classes of microbes that Regulatory Agencies may want to consider down regulating.
- More consistency between Agencies is needed in regulations, especially for nonpathogens such as *Trichoderma harzianum* and *Bacillus subtillus*

Need to Consider Risk of Not Releasing Microbe

- What is the cost (monetary, environmental) of maintaining the *status quo*?

Need a Glossary

- Plant pathologist, weed scientists, and entomologists often use terms in different ways. We need to know what these terms mean to Regulatory Agencies. For example: strain; classical biological control